

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

BROCK FREDIN,

Plaintiff,

--against--

CITY PAGES,
MICHAEL MULLEN,

Defendants.

DECLARATION OF BROCK FREDIN

Case No. 19-CV-472

STATE OF WISCONSIN }
 ss:
COUNTY OF SAINT CROIX }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceeding. I submit this declaration in support of my Second Amend Complaint filed on February 20, 2020. For the reasons stated herein and within my memorandum of law dated February 20, 2020, my motion for leave to file a Second Amended Complaint should be granted in its entirety.

AUTHENTICATION OF DOCUMENTS

2. Attached hereto as **Exhibit A** is a true and correct copy of a February 22, 2017 article from the *City Pages* titled “Accused stalker Brock Fredin is writing a horror story”.

3. Attached hereto as **Exhibit B** is a true and correct copy of Saint Paul Police Complaint Numbers 16122823 and 16253015 between November 15, 2016 and February 22, 2017.

4. Attached hereto as **Exhibit C** is a true and correct copy of an April 21, 2017 email between David McCabe and Grace Miller.

5. Attached hereto as **Exhibit D** is a true and correct copy of an January 24, 2017 email between Lindsey Middlecamp and Mary Ellen Heng.

Dated: February 20, 2020

A handwritten signature in dark ink, appearing to read "Brock Fredin", with a stylized, cursive script.

s/ Brock Fredin
Brock Fredin
Hudson, WI
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, pro se

A

Accused stalker Brock Fredin is writing a horror story, and he's the main character

Wednesday, February 22, 2017 by

Mike Mullen

in

News



Brock Fredin has restraining orders from two women. Neither victim's ordeal is over.
Submitted photo

In January 2014, Catherine Schaefer found a guy through an online dating site.

Brock Fredin was cute and seemed like a good match. They agreed to meet for a drink sometime at a Twin Cities watering hole.

As Schaefer would later state in court records and an affidavit, the date never happened. Before they met in person, Fredin sent a series of “very odd” and intense texts. Schaefer decided a meeting was “not in her best interests.”

She canceled and told Fredin to stop contacting her. He responded with a desperate plea, at one point offering her money to reconsider. Schaefer’s firm replies shut the door. Or so she thought.

Over the next two years, she was contacted dozens of times by unfamiliar cell phone numbers and online dating profiles. In longer communiques, Schaefer recognized Fredin's "unique" writing style, she wrote in the affidavit. Other messages just said, "Hi Cat." No one else called her that.

On two occasions, Schaefer claims, her mysterious correspondent sent images of his face, perhaps inadvertently. Schaefer found herself looking at Fredin's boyish countenance.

"No one will talk to me," Fredin wrote under a pseudonym, according to the affidavit. "I'm hot and still nothing. You blocking me breaks my heart. I'm so hurt. I start to treat all women like shit based on the lessons women like you provide."

Another message the same night and quoted in Schaefer's affidavit threatened Schaefer with "consequences," and listed the names of her advisors at Penn State University, where she was then pursuing a PhD. (Fredin and his attorney declined to comment for this story.)

Schaefer contacted Pennsylvania police, who told her it'd be hard to get an order against someone who wasn't an intimate partner. A Minneapolis cop told her she'd need to file in person — and be prepared to fly in more. She couldn't afford that.

Exasperated, Schaefer took to Facebook, detailing how a guy she'd never met was haunting her. A friend shared her post. Another Twin Cities woman soon reached out. Schaefer wasn't Fredin's only victim.

In a story that, like Schaefer's, would one day be told in court records, Fredin and the other woman met in fall 2015 through a dating site. After a few dates, she sensed something was off. One night, what the woman now calls a set of "creepy" text messages pushed her over the edge, and she broke it off.

Fredin wasn't having it. "Nope," he wrote her, in an exchange later quoted in an appeals court ruling. "We are dating. Yes, you are taking me to see your family."

The messages, some sexually suggestive, continued for weeks. “Get on your knees and think of me,” he wrote, according to the ruling. But he’d picked the wrong victim. “Fuck you and your cruel thought experiments,” she wrote back one night. “You’ve done this shit before. We are NOT going on the occasional date. I am done talking to you.”

Early last year, the woman filed for a restraining order, which was swiftly granted. Then she coached Schaefer through getting her own. Fredin hired Nathan Hansen, an attorney who advertised for clients on a website that says restraining order claims are often “scandalous, without merit,” and the accused should “lawyer up and explore your options.”

Hansen filed to make Schaefer undergo a deposition, something her attorney said was “unheard of” in a stalking case; later, he withdrew that request. Schaefer’s evidence of unwanted contact through the years was overwhelming. Her order was granted.

Neither woman’s ordeal is over. Both have found profiles posted under their names on datingpsychos.com, a skeezy site that allows anonymous character assassination.

Schaefer’s says she “stalks, harasses, and bullies.” The second woman’s profile says she’s a “certified piece of shit,” a “bully” who will “stalk and harass you” and “drag you into a legal battle.” Datingpsychos.com’s business model: They’ll kindly remove your profile if you pay a \$100 ransom.

In January, Fredin filed a discrimination complaint with Penn State against Schaefer; in his complaint, Fredin accuses her of stalking him. Fredin’s complaint notes he, the victim, has a “Master’s in Software Engineering” and owns a “well known web application used by many.”

Schaefer’s worried about reputational damage, a trail of poisoned breadcrumbs leading to her name. She studies child and adolescent psychology, specifically gender identity, not things entrusted to someone with a bad reputation on Google.

Still, her assessment of her predicament is unfailingly humane. “There’s not necessarily a logic to it when someone feels entitled to your time and attention. I think he has a lot of pain in him somewhere.”

It's a gentler view than Appeals Court Judge Kevin Ross took last month. Fredin appealed the second victim's case, claiming a district court had erred.

This was all a misunderstanding, Fredin claimed. The evidence against him was insufficient, though he did cop to publishing longing musings online about the woman. But those were akin to the writings of Edgar Allan Poe's "The Raven," mournful laments of love lost.

Judge Kevin Ross ruled the evidence had nothing to do with 19th-century poetry, and everything to do with a menacing deployment of 21st-century communication tools against a woman who wanted to be left alone.

Ross closed his opinion with a little advice: "When one is characterized, rightly or wrongly, as a frighteningly obsessive ex-boyfriend eligible for a harassment restraining order, the typical strategy for a reversal does not include aligning oneself with an allegedly opium-inspired author whose obsession with his deceased lover and other macabre poetry and prose are most commonly narrated for their chilling effect."

In a way, Brock Fredin was right. This is a horror story. He is its author and main character. Innocent victims have turned into badass heroines, and they're suddenly stealing the plot. It's a thrilling twist. But someone should cancel this dark serial before its next chapter is written.

Learn more about resources for victims of stalking and/or harassment in the Twin Cities:

The Aurora Center

(<http://aurora.umn.edu/pdf/Stalking%20Handout.pdf>),

the

Battered Women's Legal Advocacy Project

(<http://www.bwlap.org/stalking>),

the

Tubman Center

(<http://www.lawhelpmn.org/organization/tubman/abuse-violence-crime-victims-rights/sexual-assault-harassment-and-stalking?ref=C4PxQ>),

,

Day One Services

(<http://dayoneservices.org/stalking/>),

and the

Minnesota Attorney General's Office

(<https://www.ag.state.mn.us/Consumer/Handbooks/VicGuide/default.asp>),

.

More from Mike Mullen:

12 questions I had watching

D2: The Mighty Ducks

in 2016

(<http://www.citypages.com/arts/12-questions-i-had-watching-d2-the-mighty-ducks-in-2016/406369045>)

Revenge porn should be illegal in Minnesota, and everywhere

(<http://www.citypages.com/news/revenge-porn-should-be-illegal-in-minnesota-and-everywhere-8108020>)

How to drive like a real Minnesotan

(<http://www.citypages.com/news/a-real-minnesota-drivers-license-test-for-passive-aggressive-perfection/405061156>)

B

Saint Paul Police Department
SUPPLEMENTAL OFFENSE / INCIDENT REPORT

Complaint Number Reference CN

Date and Time of Report

16122823

05/02/2017 18:

Primary offense:

HARASSMENT-STALKING LAW VIOLATION

Primary Reporting Officer: McCabe, David E

Name of location/business:

Primary squad:

Location of incident: 1180 GRAND AV Apt 2

Secondary reporting officer:

ST PAUL, MN 55104

Approver:

District: Central

Date & time of occurrence: 01/01/2014 11:48:00 to

Site:

06/20/2016 11:48:00

Arrest made:

Secondary offense:

Police Officer Assaulted or Injured:

Police Officer Assisted Suicide:

Crime Scene Processed:

NARRATIVE

On 05/02/2017, I (Sgt McCabe, SPPD), received the following information from a subpoena served on Google Voice at the request of the SPCA.

List of Files for CN 16122823:

1. 16122823-05012017_053154-STALKING(6125640343.Golfflow4@gmail.com.Voice).txt - Google Voice Return for 6125640343
2. 16122823-05012017_053154-STALKING(6125640343.VHarma@mypanthers.org.Voice).txt - Google Voice Return for 6125640343
3. 16122823-05012017_053154-STALKING(9522228094.Golfflow4@gmail.com.Voice).txt - Google Voice Return for 9522228094
4. 16122823-05012017_053154-STALKING(Letter 991052).pdf - Google Voice Letter

The labeled photos were TRANSFERRED to the Media Vault.

None of the results obviously directly connect to FREDIN.

PUBLIC NARRATIVE

Last page of the report

Saint Paul Police Department

SUPPLEMENTAL OFFENSE / INCIDENT REPORT

Complaint Number Reference CN

16253015

Primary offense

HARASSMENT-STALKING LAW VIOLATION

Date and Time of Report
04/18/2017 08:23:00

Primary Reporting Officer: McCabe, David E

Primary squad

Secondary reporting officer:

Approver:

District: Western

Site:

Name of location/business:

Location of incident: 1180 GRAND AV Apt 2
ST PAUL, MN 55105Date & time of occurrence: 11/15/2016 00:23:00 to
12/10/2016 10:21:00

Arrest made:

Secondary offense:

Police Officer Assaulted or Injured:
Crime Scene Processed:

Police Officer Assisted Suicide:

NARRATIVE

On 03/31/2017, I received a response to an administrative subpoena served to Onvoy, LLC (via Email), that provided the Whole saler information to [763-515-4376] as; Text Plus, INC.

On 4/6/2017, I served an administrative subpoena on TextPlus, INC. (via email), for subscriber information for [763-515-4376], and on 04/13/2017 received data back from that request. That data was added to the SPPD Media Vault.

That data showed, that on 01/02/2017 @ 1428 (GMT), the [IP Address 74.44.215.189] (which shows that it is owned and operated from Frontier Communications), was being used at that time.

On 04/17/2017, I served an administrative subpoena on Frontier (via Corporation Service Company, Christine Olund), for subscriber information and address of [IP Address 74.44.215.189]. On 04/18/2017, I received a response from Frontier with the following subscriber information; Twin City Steel Erectors INC (13065 132nd ST W, Apple Valley, MN, 952-423-6101).

At this time there is no known connection between Brock FREDIN and that company.

List of Files for CN 16253015:

1. 16253015-04162017_234616-STALKING(1111550_NextPlus_Activity).csv - TextPlus Activity
2. 16253015-04132017_105934-STALKING(prov1xbc@gmail.com_VoiceCalls).csv - TextPlus Calls

The labeled photos were TRANSFERRED to the Media Vault.

List of Photos for CN 16253015:

1. 16253015-04182017_113714-STALKING(Frontier AS Return).pdf - Frontier AS Return

SP0000025C423204

Saint Paul Police Department

SUPPLEMENTAL OFFENSE / INCIDENT REPORT

Complaint Number Reference CN

16122823

Date and Time of Re

03/30/2017 08:

Primary offense

HARASSMENT-STALKING LAW VIOLATION

Primary Reporting Officer McCabe, David E

Name of location/business

Primary squad

Location of incident 1180 GRAND AV Apt 2

Secondary reporting officer

ST PAUL, MN 55104

Approver

District Central

Date & time of occurrence 01/01/2014 11:48:00

Site

06/20/2016 11:48:00

Arrest made:

Secondary offense

Police Officer Assaulted or Injured

Police Officer Assisted Suicide

Crime Scene Processed

NARRATIVE

On 07/01/2016, the victim of this incident reported that she had two "odd" calls in the same night. The following are the reported numbers and what was found on them:

619-300-7684, Lists to a Patrick Oshoa, as a utility (through cingular wireless), out of San Diego CA (and has since 2011). An internet search also revealed this number as a possible telemarketer.

206-201-1847, Lists to a business (Pac West Telecom, INC), out of Stockton CA. an internet search also revealed this number as a possible telemarketer.

Saint Paul Police Département

SUPPLEMENTAL OFFENSE / INCIDENT REPORT

Complaint Number Reference CN

Date and Time of Report

16253015

03/30/2017 09 39 00

Primary offense.

HARASSMENT-STALKING LAW VIOLATION

Primary Reporting Officer: McCabe, David E

Name of location/business:

Primary squad.

Location of incident: 1180 GRAND AV Apt 2

Secondary reporting officer

ST PAUL, MN 55105

Approver

District: Western

Date & time of occurrence. 11/15/2016 00:23 00 to

Site.

12/10/2016 10:21 00

Arrest made.

Secondary offense.

Police Officer Assaulted or Injured:

Police Officer Assisted Suicide.

Crime Scene Processed:

NARRATIVE

On 01/02/2017, I (Sgt McCabe, SPPD Sex Crimes) received an email from the victim of this incident, reporting that she received a message from an unknown person and suspect it may be FREDIN. In the message the sender (763-515-4376) tries to initiate contact with the victim, claiming to be a friend "from online, a long time ago". The victim requested that the sender send a picture, and they sent a picture the victim did not recognize. The victim was also advised to contact her local PD.

This information was initially screened by the SPCA, but because there is no specific content in the message suggesting that FREDIN was the sender, it was deemed insufficient as evidence for a single violation, however, in totality of this situation, efforts are being made to identify the sender's location and identity (if known).

On 03/30/2017, a subpoena was sent to Onvoy, LLC (legal@onvoy.com), requesting customer information for #763-515-4376.

PUBLIC NARRATIVE

Last page of the report

C

Dunn, Storme (CI-StPaul)

From: Grace Miller <mill6531@umn.edu>
Sent: Friday, April 21, 2017 10:39 AM
To: McCabe, David (CI-StPaul)
Subject: RE: more posts

It's mmullen@citypages.com. I think he'll lock them if I ask.

As far as professional impact, I haven't dealt with any yet. I've been at this unit for a couple years, and these people know me. I have told my boss about it, and we're on the same page.

BUT that will change when I leave here. I'm applying for a legislative fellowship next year and I won't get it if there's dirt about me on the internet - it's super selective, and I imagine the background checks are very stringent. I have been looking at datingpsychos and his facebook and other sites like the City Pages article now, just to make sure a bunch of defamation doesn't accumulate in the far reaches of the internet to surprise me next time I look for a job. It's exhausting but I feel like I have to watch for it.

On Apr 21, 2017 9:59 AM, "McCabe, David (CI-StPaul)" <david.mccabe@ci.stpaul.mn.us> wrote:

Can you send me the writers email. I will also express my desire that he closes the comments on that article. That should help if he is hesitant

From: Grace Miller [mailto:mill6531@umn.edu]
Sent: Friday, April 21, 2017 8:44 AM
To: McCabe, David (CI-StPaul)
Subject: RE: more posts

Yes - I emailed the writer last night and asked him to remove the posts. He's thinking about just locking the comments so that no one else can write anything. I really don't like my name (especially with my military rank) posted publicly, but Brock has been posting defamation with my full name and military rank since last June. I have very little sympathy for his current situation.

On Apr 21, 2017 7:36 AM, "McCabe, David (CI-StPaul)" <david.mccabe@ci.stpaul.mn.us> wrote:

Ok, I will add these. It looks like they are down based off of the link you sent. Do you know if City Pages has been editing their comments for that article? I will try to work backwards from facebook and see what that turns up.

From: Grace Miller [mailto:mill6531@umn.edu]
Sent: Thursday, April 20, 2017 9:21 PM
To: McCabe, David (CI-StPaul)
Subject: more posts

Hi Sgt McCabe,

Brock posted several responses to the City Pages article in which he addresses me by name and military rank (and Catherine as well) and accuses us both of criminal activity. I've attached some screen shots, but the comments are here:

<http://www.citypages.com/news/accused-stalker-brock-fredin-is-writing-a-horror-story-and-hes-the-main-character/414395703>

Grace

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Grace

D

From: 13.82 " <13.82 >

To: "Heng, Mary Ellen" <MaryEllen.Heng@minneapolismn.gov>

Subject: your counterpart at St. Paul?

Date: Tue, 24 Jan 2017 15:44:45 +0000

Attachments: 13.82 _petitioner_Respondent_v_Brock_Fredin_Appellant.pdf

Inline-Images: image003.png

Mary Ellen,

Do you know/have contact info for your counterpart at the City of St. Paul? This is something of a professional courtesy email that, if you felt it was appropriate, I was hoping could be forwarded to their attention.

I have a friend who, in November of last year, got a restraining order against a man in St. Paul who stalked her for nearly two years even after she moved out of state all because she declined to meet him after brief contact on a dating site. He has retaliated against the restraining order in several dramatic ways; after storming out of the hearing at which it was granted, he promptly registered and launched a website referring to her by full name as a stalker and sexual predator and linking to her contact

13.82

Yesterday, the Court of Appeals issued an opinion in a different matter brought by a different woman () against the same man. I'm attaching it here. I can tell you that I've spoken with several of his former colleagues or acquaintances and this seems like a very troubled individual with a documented history of serial harassment and escalation. He has been kicked out of a local gym for concerning threatening behavior towards a trainer, has been blacklisted from certain community groups for his alarming online conduct, etc. I have serious concerns that if he is not held accountable for violations of this restraining order, he will escalate either in his aggression against my acquaintance, or in parallel tracks against other women.

The "professional courtesy" angle here is that I'm also aware my friend is being contacted by journalists with MPR and City Pages about her experiences with this man and other women's restraining orders and issues with him. I believe it is likely the narrative will take a position that "St. Paul is doing nothing to protect them" in light of the cops basically telling her her main recourse was stop googling her own name and try to move on with her life despite his persistent attempts to sabotage and harass her. I thought it was worth at least forwarding the Court of Appeals decision to the potential prosecutors to see if the pattern/trend of this man's troubling behavior causes them to have more confidence in the need to pursue him in 13.82 case. I know resources and other considerations dictate case load but sometimes having another lawyer confirm this isn't a total goose chase seems helpful in giving things another look.

13.82

Minneapolis
City of Lakes